

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Amendment of Part 90 of the Commission's)	WP Docket No. 07-100
Rules)	
)	PS Docket No. 06-229
Implementing a Nationwide, Broadband,)	
Interoperable Public Safety Network in the)	
700 MHz Band)	
)	WT Docket No. 06-150
Service Rules for the 698-746, 747-762 and)	
777-792 MHz Bands)	

**COMMENTS
of the
COUNTY OF LOS ANGELES, CALIFORNIA**

The County of Los Angeles, California (“the County”) hereby submits the following comments in response to the Commission’s *Fifth Notice of Proposed Rulemaking*, FCC 12-61, released June 13, 2012 (“*Fifth NPRM*”), in the above-captioned proceedings concerning the 4.9 GHz band.

The County appreciates the opportunity to submit these brief comments regarding 4.9 GHz, an important public safety spectrum resource that has not been fully utilized in an efficient or effective manner in many areas. To rectify the situation, the Commission should require more “coordinated” assignment and use of the 4.9 GHz band. The current disarray in the band is inefficient, prone to interference, and discourages its use for mission-critical communications. The County, therefore, supports the need for formal frequency coordination, utilizing the current certified public safety frequency coordinators, as well as local frequency advisors and

committees wherever possible.¹ The current 700 MHz Regional Planning Committees (or an entity designated by the committees) should also be part of the planning and frequency assignment process.

The County does not support suggestions that non-public safety entities be allowed to hold licenses in the 4.9 GHz band, at least not in metropolitan areas. Such use could diminish the ability of public safety entities to make full use of the band, especially in urban areas where there is likely to be substantial demand for public safety mesh networks, point-to-point communications, and tactical airborne communications utilizing 4.9 GHz frequencies.

The Commission also inquires as to whether the First Responder Network Authority (FirstNet) should be eligible to hold licenses in 4.9 GHz, noting that FirstNet could use the band for backhaul links to support the 700 MHz national public safety broadband network. The County supports such eligibility for FirstNet, provided that the backhaul use is approved by the relevant regional planning committee.

¹ In Southern California, the California Public-Safety Radio Association (CPRA), a chapter of APCO, serves as a “frequency coordinating” committee and works closely with APCO’s local frequency advisor for the region.

CONCLUSION

Therefore, the County of Los Angeles urges the Commission to adopt rules to provide for more effective and efficient use of the 4.9 GHz band, consistent with the comments set forth above.

Respectfully submitted,

COUNTY OF LOS ANGELES

By:

Ron Wong
Radio Systems Division
County of Los Angeles
1110 N. Eastern Avenue
Los Angeles, California 90063

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